

8EHQ-1297-14088

MR 2779

High Point Chemical

A Kao Group Company

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December 10, 1997

Contains No CBI

Document Processing Center
(Attn: Section 8(e) Coordinator) Mail Code 7407
Office of Pollution Prevention and Toxic Substances
U.S. Environmental Protection Agency
401 "M" St., S.W.
Washington, D.C. 20460

97 DEC 11 AM 11:55

RECEIVED
OPPT CHIC

Dear Section 8(e) Coordinator:



8EHQ-97-14088

This letter is to notify the Agency that I have recently received and reviewed the summary of an ecotoxicity testing report from Kao Corporation, which suggests that adverse effects may result from exposure to a fragrance substance. This product (CHINCHILOL) was introduced to the U.S. under a Low Volume Exemption, L-91-177, through High Point Chemical Corporation, which is the U.S. Chemical Division of Kao Corporation, headquartered in Japan.

This substance has never been sold in the U.S., although samples have been distributed. Because this substance is a severe irritant, we have complied with the EPA requirement to alert customers (potential) of the hazard and the need to use proper personal protection equipment.

The summary of the results of the Daphnia acute toxicity testing was reviewed on December 10, 1997.

Chemical Description:

CASRN: 105463-44-3

CBI status: NON-CONFIDENTIAL

Although the product was originally filed as Confidential, we wish to withdraw all confidentiality claims.

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Usage pattern:

This substance is not intended for large volume use. It is used as a minor ingredient of a finished fragrance which is used in household products such as detergents and softeners.

As an example of the usage:

1. The finished fragrances can readily contain 20 or more components, one of which would be this substance.
(The fragrance formulation is specific to the user involved, and is not determined by Kao Corporation, when this substance is sold to others).

The range of percent composition of individual fragrances in finished fragrances that we have seen for products made by Kao Corporation is 0.01% -71% .

Because this substance is very expensive, and very powerful, the percentage of this substance in a finished fragrance is expected to be very small.

2. The range of concentration of individual fragrances in household detergents (or other household products) from our experience, has been between 0.01% to 6 %.

The amount of this substance in the example detergent formulation would be very small because it is very powerful, and because of the high cost. Hence, 0.2% is a reasonable estimate.

3. Very little of this substance is expected to be released into the aquatic environment at the time of usage because :
 - a. The detergent is diluted by a factor greater than 100 times in usage.
 - b. The substance is insoluble in water, hence will tend to adsorb to the fabrics being washed. As an aroma, the fragrance material will slowly vaporize into the atmosphere.

Adverse Effects being reported:

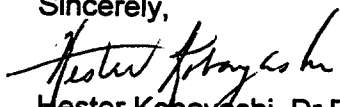
Please find attached (Attachment 1), the summary of the acute toxicity study on Daphnia (48 hr. , OECD No1 202, Part 1 and EEC Directive 67/548. The effect is at the borderline between moderate and high concern, by EPA criteria.

In our evaluation, the potential for damage to the aquatic environment is minor., as explained in items 2 and 3 above. However, these results of the ecotoxicity test are being reported in order make the information available to the Agency for an official interpretation.

The complete report, will be made available to the Agency upon request. Results of toxicity tests available at the time of the LVE application were provided at the the time of the filing.

The submission of the attached information is part of Kao Corporation's good faith effort to comply with requirements under TSCA Section 8(e).

Sincerely,

A handwritten signature in black ink, appearing to read "Hester Kobayashi", written over the printed name.

Hester Kobayashi, Dr.PH
Manager, Kao Product Safety, North America

SUMMARY

Test substance : Chinchilol.

Test species : *Daphnia magna* (Straus) tested in the 1st instar.

Test type : Acute toxicity. 48 h EC₅₀ (immobilisation).

Test conditions : Static test conditions according to OECD Guideline No. 202, Part 1 and EEC Directive 67/548 Annex V C.2 as published in 84/449/EEC.

Results

Test substance : Chinchilol.

Time (h)	EC ₅₀ (mg/l)	95% confidence limits (mg/l)
24	0.81	0.65 - 1.0
48	1.0	0.82 - 1.2

"no effect" level at 24 h = 0.31 mg/l

"no effect" level at 48 h = 0.12 mg/l

All calculations are based on mean measured concentrations. Measured values ranged from 72 - 95% of nominal at 0 hours and 30 - 57% at 48 hours (average 67%).

ENTRY FORM

CAPNUM	LTR	DATE	CBI	CASNO	CONCERN	AI	SOLUBILITY
14088	a	1297		105463443	HIGH	NS	NS

CHEMNAME

Chinchilol, static

PHYSTATE

NS

ORGANISM

Water flea, Daphnia magna

DURATION

48h

ENDPOINT

EC50

CODE

TOXVALUE

1.0

UNITS

mg/l

MELTINGPT

NS

COMMENTS

24h;48hNOEL=0.31;0.12mg/l
measured